

TRI UPDATE

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- TRI expansion
- Chemical list changes
- Reporting form changes
- Guidance
- Form R submissions/revisions

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INDUSTRY EXPANSION

- In 1997, TRI added seven new industries (metal mines, coal mines, electricity generating facilities, petroleum bulk terminals, chemical distributors, solvent recyclers, & hazardous waste treatment and disposal facilities)
 - First Form R reports were due by July 1, 1999 (for RY '98)
 - EPA has prepared guidance documents for specific industries
 - New supplier notification requirements for facilities in SIC codes 20-39
 - EPA revised definition of "otherwise use" to include on-site disposal, stabilization (without subsequent distribution in commerce), or treatment for destruction of wastes received from off-site

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INDUSTRY EXPANSION

- EPA considering petition to add SIC code 45, Transportation By Air (February 10, 1998; 63 FR 6691)
 - EPA also considering modification to the motor vehicle exemption and other exemptions

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CHEMICAL LIST CHANGES

- Phosphoric acid deleted, effective RY 1999
- Chromium compounds qualifier added: (except for chromite ore mined in the Transvaal Region of South Africa and the unreacted ore component of the chromite ore processing residue (COPR)) (May 11, 2001)
- Vanadium (except when contained in alloy) and vanadium compounds added, effective RY 2000
- Certain PBT chemicals added, effective RY 2000, in the PBT final rule (October 29, 1999; 64 FR 58666)

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CHEMICAL LIST CHANGES

- Final rule designates lead and lead compounds as PBT chemicals (January 17, 2001; 66 FR 4500)
 - Lead (except when contained in stainless steel, brass and bronze alloys): 100 pound threshold
 - Lead compounds: 100 pound threshold
 - Reporting begins RY 2001, Form R reports due by July 1, 2002

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CHEMICAL LIST CHANGES

- Proposal to add diisononyl phthalate (DINP) category, a plasticizer (September 5, 2000; 65 FR 53681; extension of comment period to February 2, 2001 - November 21, 2000; 65 FR 69888)

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REPORTING FORM CHANGES

- New for RY 2000
 - New Federal Information Processing Standards (FIPS) codes for Section 6.2 transfers to foreign countries
 - New identifier (check box) for GOCOs (government owned contractor operated facilities)
 - New section for distribution of each member of the dioxin and dioxin-like compounds category in Part II, Section 1.4
 - New option to check "Processing as an impurity" in Part II, Section 3.2
 - First SIC code box identified as primary SIC code

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GUIDANCE

■ New TRI guidance documents for the following industries:

- Presswood and Laminated Products Industry
- Rubber and Plastics Manufacturing
- Printing, Publishing and Packaging Industry
- Textile Processing Industry
- Leather Tanning and Finishing Industry
- Semiconductor Industry
- Spray Application and Electrodeposition of Organic Coatings
- Food Processors

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GUIDANCE

- Aqueous Ammonia
- Dioxin and Dioxin-like Compounds Category
- Chlorophenols
- Certain glycol ethers
- EBDC
- Hydrochloric acid aerosols
- Lead and Lead Compounds
- Mercury and Mercury Compounds
- Nicotine and Salts
- Nitrate compounds
- Pesticides and Other Persistent Bioaccumulative Toxic (PBT) Chemicals
- Polychlorinated alkanes
- Polycyclic aromatic compounds
- Strychnine and salts
- Sulfuric acid aerosols
- Warfarin and salts

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TRI REPORTING SOFTWARE

- For the Reporting year (RY) 2001, EPA is distributing two types of reporting software to assist facilities in reporting to the Toxics Release Inventory (TRI).
- The *TRI-Made Easy (TRIME)* Reporting Software was distributed to a limited number of facilities for a pilot in RY 2000. It is now available to all facilities for RY 2001.
- The *Automated TRI Reporting Software (ATRS)* is the traditional reporting software that has been distributed by EPA for a number of years.
- For RY 2001, facilities may report using either *ATRS* or *TRI-ME*; however, EPA plans to transition from *ATRS* to *TRI-ME* in the near future.

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TRI REPORTING SOFTWARE

- Both *ATRS* and *TRI-ME* will be distributed via CD ROM to all facilities that have reported to TRI in the last two reporting years. The software will also be available to download from EPA's website at www.epa.gov/tri.
- The *TRI-ME* software is an interactive, intelligent, user-friendly software program that assist facilities in determining and completing their TRI reporting obligations. In contrast, while *ATRS* allows facilities to complete the Form Rs and As on their personal computers, it provides much less guidance and assistance.
- Both *TRI-ME* and *ATRS* allow users to access and search the *TRI Assistance Library (TRIAL)*. *TRI-ME* is intelligently linked to *TRIAL* so that the user can view pre-selected TRI definitions and guidance from *TRIAL* that are relevant to specific *TRI-ME* screens.

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COMPARISON OF *TRI-ME* VERSUS *ATRS* FOR RY2001

- Guides the user through the process of determining whether they must report based on their SIC code and number of employees. Helps determine the primary SIC code. (*TRI-ME*)
- Guides facilities through process of determining whether they exceed the chemical activity thresholds. (*TRI-ME*)
- Allows users to access and search *TRIAL*. (*TRI-ME* & *ATRS*)
- Intelligently linked to *TRIAL*. (*TRI-ME* & *ATRS*)
- Allows users to load or import their facility information and chemical names from RY 1999 or RY 2000. (*TRI-ME* & *ATRS*)

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COMPARISON OF *TRI-ME* VERSUS *ATRS* FOR RY2001

- Allows users to load or import their facility information and chemical names from years prior to RY 1999. (*ATRS*)
- Allows users to load or import their prior year quantitative information on releases and waste transfers. (*ATRS*)
- Guides facilities in completing the Form R and A by explaining each element of the form through a questionnaire format. (*TRI-ME*)
- Allows expert TRI users to bypass most of the *TRI-ME* guidance and directly enter the data into the forms (not applicable to *ATRS*).
- Allows users to directly enter data into the forms on a computer screen. (*TRI-ME* & *ATRS*)

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COMPARISON OF *TRI-ME* VERSUS *ATRS* FOR RY2001

- Streamlines the completion of Form R, Part II, section 7a information on waste treatment methods. (*TRI-ME*)
- Prevents facilities from making common errors while completing the Form R and A (*TRI-ME* & *ATRS*)
- Checks (validates) the forms to identify critical and potential errors that should be corrected before submitting the forms to EPA. (*TRI-ME* & *ATRS* {some})
- Allows users to print their forms on paper or to create a diskette (using the same file format from RY 2000). (*TRI-ME* & *ATRS*)
- Allows users to submit their forms to EPA electronically over the Internet via EPA's Central Data Exchange. (*TRI-ME*)

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TRI MADE EASY (*TRI-ME*) (cont.)

- *TRI-ME* is integrated with EPA's Central Data Exchange (CDX), the Agency's central portal for environmental data
- *Registration* – Pre-populates facility ID information, *MyCDX* messaging
- *Security* – Your information is protected by username and password (and secret question/answer) that you create
- *User Support* – 1-888-890-1995
- *Provides burden reduction* - saves time over conventional submission methods using a freeware Internet browser
 - Signed, *TRI-ME* generated paper certification still needs to be sent via US Postal Service, FedEx, etc.

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TRI ASSISTANCE LIBRARY

- TRI Assistance Library (TRIAL) is with EPA's Automated TRI Reporting Software (TRI-ME/ATRS). TRIAL is a self-contained help system that includes:

- Electronic versions, or links to electronic versions, of the statutes, regulations, executive orders, chemical-specific guidance documents, and industry-specific guidance documents
- Keyword and full text search capabilities on these guidance documents
- Links to the EPA websites, including EPA's homepage, TRI website, and other useful websites that will assist with TRI reporting

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FORM R SUBMISSIONS/REVISIONS

Reminder:

- To be included in the TRI Explorer version distributed with the most current TRI data release, voluntary revisions must be submitted by July 31 of the same year as the reporting deadline

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FORM R SUBMISSIONS/REVISIONS

Reminder:

- Form R submitted to replace previously filed Form A
 - Considered to be a late submission of a Form R and a request for a withdrawal of the previously filed Form A
 - Do not check the revision box!

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THRESHOLD GUIDANCE

Reminder:

- Section 313 chemicals coincidentally manufactured (including from exempt otherwise use activities) must be considered towards the manufacturing threshold
 - Acid aerosols and metal compounds manufactured as by-products of fuel combustion

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THRESHOLD GUIDANCE

Reminder:

- For threshold determinations, the definitions of “manufacture,” “process,” and “otherwise use” currently do not include Section 313 chemicals that are:
 - Remediated
 - Demolished
 - Treated in wastes generated on site
 - Stored
 - Recycled on-site for use on-site
 - Transfers sent off-site for further waste management (not including recycling)
- These activities do not constitute threshold activities N-21

EXEMPTION GUIDANCE

Reminder:

- Section 313 chemicals in gasoline used to refuel motor vehicles not operated by the facility are considered processed and do not qualify for the motor vehicle maintenance exemption
- Laboratory activities exemption only applies to certain activities that take place in a laboratory

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